

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

XIAO LING CHEN, ZENG BIAO TENG, XUAN  
BIN FANG and HUI LING CHEN, on behalf of  
themselves, FLSA Collective Plaintiffs and Class  
Members,

Plaintiffs,

v.

XPRESSPA AT TERM. 4 JFK, et al.,

Defendants.

No. 15 Civ. 1347 (CLP)

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT, CONDITIONAL CERTIFICATION OF THE  
SETTLEMENT CLASS, APPOINTMENT OF PLAINTIFFS' COUNSEL AS CLASS  
COUNSEL, AND APPROVAL OF PROPOSED NOTICE OF SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of the Class Action Settlement, Conditional Certification of the Settlement Class, Appointment of Plaintiffs' Counsel as Class Counsel, and Approval of Proposed Notice of Settlement ("Motion for Preliminary Approval"), and the Declaration of C.K. Lee in Support of Plaintiffs' Motion for Preliminary Approval ("Lee Declaration"), Plaintiffs respectfully request that the Court enter an Order:

- (1) granting preliminary approval of the Settlement Agreement and Release ("Settlement Agreement"), Decl. of C.K. Lee ("Lee Decl.") Ex. A;
- (2) certifying the proposed class for settlement purposes only;
- (3) appointing Lee Litigation Group, PLLC ("Lee Litigation Group") ("Plaintiffs' Counsel") as Class Counsel;

- (4) approving the proposed Notice of Proposed Settlement of Class Action Lawsuit and Fairness Hearing, Lee Decl. Ex. B;
- (5) approving Advanced Litigation Strategies, LLC as Claims Administrator; and
- (6) granting such other, further, or different relief as the Court deems just and proper.

\* \* \*

Plaintiffs have contemporaneously submitted a Proposed Order, attached hereto as

**Exhibit A**, for the Court's convenience.

Dated: August 10, 2020  
New York, New York

Respectfully submitted,

LEE LITIGATION GROUP, PLLC

By: /s/ C.K. Lee  
C.K. Lee (CL 4086)  
Anne Seelig (AS 3976)  
148 West 24th Street, 8th Floor  
New York, NY 10011  
(212) 465-1188  
*Attorneys for Plaintiffs and the Class*